

# EXHIBIT A

**From:** Paul J. Kozacky <pkozacky@kwmlawyers.com>  
**Sent:** Saturday, July 10, 2021 9:45 AM  
**To:** Michael A. Hierl; Matthew J. Piers  
**Subject:** Millennium Media and PML  
**Attachments:** Demand letter.pdf; 2021 KWM Wire Transfer-ACH Instructions.pdf

**Follow Up Flag:** Flag for follow up  
**Flag Status:** Flagged

Gentlemen—

Attached is a demand letter sent on behalf of Millennium Media, Inc. and its agent PML, and wire instructions for my firm's client trust account. Please advise if you have any difficulty opening either up. We look forward to hearing from you. Thank you for your attention,

**Paul J. Kozacky**  
Attorney at Law – Proctor in Admiralty



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July 10, 2021

*via e-mail*

Matthew J. Piers, Esq., president  
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70 West Madison Street, Suite 4000  
Chicago, Illinois 60602

Michael A. Hierl, Esq.  
Hughes Socol Piers Resnick Dym, Ltd.  
70 West Madison Street, Suite 4000  
Chicago, Illinois 60602

Re: PML Process Management, Ltd., agent  
and Millennium Media, Inc., principal

Gentlemen—

This firm represents Millennium Media, Inc. and PML Process Management, Ltd., its current copyright enforcement agent. We are writing further to your firm's February 1, 2012 engagement letter which governs this matter.

As Mr. Hierl knows, on December 7, 2020 your firm was informed by General Counsel DelMarie C. Broco of Millennium Media that it had appointed PML as its new agent with respect to all copyright enforcement matters, including the copyright matters undertaken by your firm pursuant to the aforementioned engagement agreement.

Your firm has been instructed that all payments and collections for past and future copyright cases and infringements shall be remitted to PML on behalf of Millennium. Your firm was instructed to wire all outstanding collections to PML on December 2, 2020. On December 10, 2020 Mr. Hierl confirmed that your firm would wire all funds held in trust in a telephone conference with Mr. Ben Perino. That did not happen despite repeated promises made by your firm commencing in December 2020 and continuing through mid-February of this year. On February 18, 2021 you were informed by Millennium and PML that all funds are to be released to PML immediately, and that any concerns you at that time first raised of potential claims of Copyright Management Services should be addressed to PML. At no time did PML or

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Millennium authorize your firm to resolve any disputes between them and CMS or your firm's other clients.

The foregoing constitutes a breach of your firm's fiduciary duty to abide Millennium's instructions to wire all monies to PML. Millennium and PML request that you wire to my firm's client trust account the remaining funds due PML which amount to \$69,765.78. Our wire instructions are attached. In the absence of prompt payment, PML reserves all of its rights, such as for prejudgment interest, and intends to file a civil complaint for this and possibly other relief.

Millennium and PML also request that your firm provide an accounting of all Millennium matters for the first and second quarter of this year. You may send that to me.

Finally, Millennium and PML also request that your firm maintain all documents, including emails, pertaining to the copyright enforcement program, to the sharing of information with your other clients, with Mr. Patrick Achache, with Copyright Management Services Ltd. or with any of Mr. Achache's other businesses. We also request that you forward any executed conflict of interest waivers that pertain to any of the foregoing or otherwise relate to Millennium to my attention.

In the absence of hearing from you by July 26, 2021, we will seek resolution of this dispute in court. Thank you for your attention to this matter,

Very truly yours,

*/s/ Paul J. Kozacky*

Paul J. Kozacky